

Exhibit 1

Proposed Order

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

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In re : Chapter 9
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CITY OF DETROIT, MICHIGAN, : Case No. 13-53846
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Debtor. : Hon. Steven W. Rhodes
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**ORDER EXCLUDING EVIDENCE PROTECTED OR WITHHELD
FROM DISCOVERY ON THE BASIS OF MEDIATION CONFIDENTIALITY**

This matter having come before the Court on *Financial Guaranty Insurance Company's Motion In Limine to Preclude the Introduction of Evidence or Testimony Regarding Matters Withheld from Discovery on the Basis of the Mediation Order* (the "**Motion**"),¹ filed by Financial Guaranty Insurance Company ("**FGIC**"); and due and proper notice of the hearing to consider the relief requested therein (the "**Hearing**") having been given to all parties registered to receive electronic notices in this matter; and the Court having held the Hearing with the appearances of interested parties noted in the record of the Hearing; and upon the entire record of all the proceedings before the Court; and the legal and factual bases set forth in the Motion establishing just and sufficient cause to grant the relief requested therein;

NOW, THEREFORE, IT IS HEREBY ORDERED THAT:

1. The Motion is granted.

¹ All capitalized terms used but not defined herein shall have the meanings attributed to them in the Motion.

2. All parties are prohibited from introducing testimony or evidence at the Confirmation Hearing that is protected by the Mediation Order or was previously withheld on account of the Mediation Order or that cannot be adequately addressed without the introduction of testimony or evidence that is protected by the Mediation Order or was previously withheld on account of the Mediation Order.

It is so ordered.